

## **Appendix A: Citizen Participation Plan and Comments**

### **Public Comment Period and Hearings**

Public Comment Period: January 5, 2006 – February 4, 2006

Public Hearings: January 23, 2006, 11:00 AM – 12:00 PM  
Department of Housing & Community Development (DHCD)  
100 Cambridge Street  
2<sup>nd</sup> Floor, Conference Room A  
Boston, MA 02114

January 25, 2006, 11:00 AM – 12:00 PM  
West Springfield Town Hall  
26 Central Street  
West Springfield, MA 01089

### **Boston Public Hearing**

#### Attendees

Kelley Whitmore, Associate Housing Planner, City of Cambridge  
Jed Baumwell, Senior Housing Officer, City of Boston  
Evelyn Friedman, Executive Director, Nuestra Comunidad  
Leedara Zola, Associate Director, Nantucket Housing Office  
Alice Boyd, Grant Consultant, Bailey Boyd Associates  
Linda Goldman, Director of Client Services, Department of Public Health HIV/AIDS Bureau  
Elaine Frawley, Federal Grants Manager, Department of Transitional Assistance  
Leslie Gleason, Special Initiative and Consumer Education Manager, DHCD  
Rebecca Frawley, HOME Program Director, DHCD  
Anne Marie Belrose, Associate Deputy for Policy Development, DHCD  
Elizabeth Malloy, Policy Analyst, DHCD  
Mark Siegenthaler, Community Development Manager, DHCD  
Lou Martin, Deputy Associate Director, DHCD  
Maureen O'Rourke, Policy and Planning Coordinator, DHCD  
Karen Bresnahan, Policy and Planning Manager, DHCD  
Daniel Rogers, HOME Housing Program Specialist, DHCD  
Matt Duval, HOME Housing Program Specialist, DHCD

### **West Springfield Public Hearing**

#### Attendees Who Testified

Joseph LaPlante, Community Development Director, City of West Springfield  
Laurie A. T. Bobskill, Resident, West Springfield

#### Other Attendees

Bill Miller, Executive Director of Friends of the Homeless, City of Springfield

Jerry Ray, Director of Homeless Services, Mental Health Association, City of Springfield  
Donna Cote, Director of Community Development, Franklin County Regional Housing & Redevelopment Authority (FCRHRA)  
Joanie Bernstein, Assistant Executive Director, FCRHRA  
Alice Davey, Community Development Director, Town of Palmer  
Karen Cullen, Development & Inspectional Services Director, Town of Spencer  
Roy Rosenblatt, Director of Community Services, Town of Amherst  
Paul E. Hills, Community Development Director, Town of Ware  
Anne Marie Belrose, Associate Deputy for Policy Development, DHCD  
Elizabeth Malloy, Policy Analyst, DHCD  
Daniel Rogers, HOME Housing Program Specialist, DHCD  
Matt Duval, HOME Housing Program Specialist, DHCD

### **Written Testimony Received**

Edward J. Gibson, Mayor, City of West Springfield  
Paul E. Hills, Executive Director, Town of Ware Community Development Department  
Alice Boyd, Community Development Consultant  
Laura Baker, Hilltown Community Development Corporation

### **Summary of Comments Received and Responses**

#### Targeting of CDBG funds

##### **Comment**

Targeting of housing rehabilitation funds will mean that homeowners outside the target area, on existing waiting lists, will no longer be eligible to participate.

##### **Response**

The Department has been encouraging targeted use of CDBG funds for the past several years. For FY 2006, DHCD requires Mini-Entitlements to target funds and provides competitive bonus points to all other communities for doing so. The FY 2006 requirements and incentives will allow the Program to better perform in ways that are consistent with federal and state goals for effective use of the CDBG program. DHCD does concur that there may be emergency housing rehabilitation cases outside a community's target area(s). Programs may be designed with up to 20% of awarded housing rehabilitation funds available to be used outside the target area for emergency purposes.

##### **Comment**

Social services do not typically target particular geographic areas. How can a community propose social services and meet DHCD's targeting requirement?

##### **Response**

DHCD has revised its targeting requirements for social services such that applicants must document that the services are available to residents of a target area. The services do not need to be provided exclusively to the target area.

FY 2005 Reductions to Housing Rehabilitation Program Awards

**Comment**

DHCD's reduction of FY 2005 grant awards for housing rehabilitation, based on uncommitted funds from the previous grant round, was unexpected, used an unrealistic view of program progress, and is detrimental to ongoing housing rehabilitation programs.

**Response**

The FY2005 CDBG One Year Plan contains performance criteria allowing the Department to reduce an award due to a low rate of committed or expended funds from a previous grant year. The Department, faced with significant demand for funds, evaluated the expenditure rate of communities with existing housing rehabilitation programs that were requesting additional housing rehabilitation funds. The Department requested current FY2004 financial information in June 2005, 11 months after award, and determined that some grantees had not yet spent funds quickly enough to warrant full funding in the FY2005 round.

DHCD is well aware of the various factors which may make progress in committing funds to individual housing rehabilitation cases difficult and unpredictable. At the same time, the Department cannot commit multiple years' worth of grant funds to a single community or particular region in anticipation of eventually meeting more of their ongoing housing rehabilitation needs. Such an approach blocks access to rehabilitation funds by other communities with similar, immediate needs.

The Department anticipates that reductions in awards may be indicated during review of FY2006 applications. If so, additional analysis and consideration of the timing, scheduling and operational factors that may be causing delayed commitments will be considered.

**CDBG 2006 One Year Action Plan Information Sessions**

<u>Information Session:</u>	Wednesday, November 30, 2005, 10:00 am to 12:00 pm West Springfield Municipal Office Building 26 Central Street West Springfield, MA
	Monday, December 12, 2005, 10:00 am to 12:00 pm Department of Housing and Community Development 100 Cambridge Street Boston, MA

The agenda for the information sessions was to discuss the preliminary proposed changes to the CDBG FY 2006 One Year Plan which are outlined below.

1. Program Goals: serve the neediest eligible communities, target resources and have measurable impacts

2. FY2006 applications will require descriptions of anticipated outcomes and measurable improvements using the performance measures defined in the Performance Outcome Measurement System distributed by HUD.
3. Community Development Strategy will be evaluated to determine adequacy – those CD strategies that do not meet the following 3 criteria will not meet the threshold and the application will not be scored:
  - a. The CD Strategy must describe the community's approach to a variety of projects and activities which include, but are not limited to, the subject of the CDBG application;
  - b. The CD Strategy must conclude with a list of projects and activities in order of the priority in which the community intends to undertake to address its community development needs;
  - c. The community must submit evidence that the CD Strategy was discussed at a public forum, meeting or hearing and that the priority list was presented and specifically discussed.
4. All CDBG activities will be subject to the new/revised Sustainable Development Threshold
5. Encourage Social Services that build economic security and self-sufficiency. Increase proportion of social services activities to 30% of a grant if 50% of the funds support services that are designed to build economic security and self sufficiency. The following are Public Social Services that meet this definition:
  - ✓ Job Training
  - ✓ Literacy Programs
  - ✓ English for Speakers of Other Languages (ESOL)
  - ✓ Job-Related Childcare Assistance
  - ✓ Job-Related Transportation Assistance
  - ✓ Individual Development Accounts (IDAs)
6. Increase value of Community Wide Needs Scores from 25 points to 35 points. CWN scores will be updated with most recent data (Unemployment Rate and Levy per Capita as a Percent of Per Capita Income). CDF 1: CWN score equal to or greater than 25. CDF 2: CWN score equal to or less than 24.
7. Application project packets will be reduced from 11 packets to 4 – Housing Activities, Construction Activities, Planning Activities, and Social Service Activities. Packets will be worth 65 points; to be determined fundable, a project packet must earn a score of at least 39 points out the possible 65. Community Needs and Community Impact questions will be eliminated.
8. Regional Applications: Each community in a regional application must comply with the same requirements as individual communities in individual applications, in order to participate in a regional grant. For example, each participating community must have a Community Development Strategy that is found to be adequate, the community must have been identified and be part of the required public participation process and the community must submit all required signatures. Communities that fail to comply will be dropped from consideration as a regional participant and the application will be reviewed on the basis of those communities that have complied with the requirements. As a result, the number of participating

communities or the dollar amount requested in a regional application may be reduced during the review process.

9. Bonus Points:

- Regional Activities – fundable projects for activities that serve multiple communities will receive an additional 5 bonus points. Both CDF1 and CDF2 applicants may submit regional applications (no longer limited to regional housing rehab for CDF2). Activities that include multiple projects will receive these points if more than 50% of the funds are for the regional project(s).
- Geographically Targeted Activities – applications may receive 5 additional bonus points when proposing activities targeted to a particular geographic area (a community with a population under 5,000 may define its entire community as the target area and receive the 5 bonus points).
- Comprehensive, Integrated Activities – applications may receive 5 additional bonus points when proposing multiple, coordinated activities in a geographic target area. A minimum of two activities must be fundable to receive these 5 bonus points – public social services cannot be one of the two activities.
- An additional five points will also be awarded if an applicant demonstrates that non-CDBG-funded activities, consistent with the community’s Community Development Strategy and complementary to the requested CDBG activities, are also targeted to the same geographic area and will also result in measurable improvements.
- Applicants will demonstrate this through an additional narrative that lists the CDBG-funded activities, the target area, the anticipated measurable improvements that will result and evidence that the activities are coordinated and integrated.

CRITERION	POINTS
Community Wide Needs	35
Project Packets	65
<b>Total</b>	<b>100</b>
Regional Bonus	5 per activity
Comprehensive/Integrated	Up to 15

11. Mini-Entitlements: required to approach CDBG projects in a coordinated and integrated manner and to target their CDBG funds to particular geographic areas in order to impact and effect change within neighborhoods and to serve an identified neighborhood or target area.

In addition to meeting threshold requirements (including threshold consistency with the Sustainable Development Principles), projects in a Mini-Entitlement application must receive 33 points in a scored application packet in order to be funded. Projects that do not meet all thresholds and do not receive 33 points when scored will not be funded and the community’s Mini-Entitlement award will be reduced accordingly.

12. The feasibility of applications will now be scored, in part, based on the completeness of environmental review prior to application submission.

13. Update timely expenditure requirements trigger date and lower the amount allowed from \$600,000 to \$400,000.
14. Eliminate Executive Order 418 requirements and available bonus points.
15. Reorganize tie-breaker criteria:
  - 1) An application from the community or region with the higher Community-Wide Needs score will be funded;
  - 2) Applications for projects that increase the community's supply of housing;
  - 3) Regional applications;
  - 4) Applications for housing and/or economic development projects that are consistent with the goals of the Administration; and
  - 5) If scores remain tied after the application of steps #1 through 4, DHCD will conduct a lottery at which a representative from HUD will be present.
16. HDSP: Applications for funding under the first round of the FY 2006 Housing Development Support Program (HDSP) must include a Community Development Strategy but it will not be reviewed for adequacy under the above criteria. Applicants to the first round of FY2006 HDSP will also not be required to submit the ER checklist with their applications.

Communities applying to HDSP are required to submit an FY2006 Commonwealth Capital Application to the Office for Commonwealth Development no later than the HDSP application due date.